

Message Text

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PAGE 01 STATE 022980

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ORIGIN TRSE-00

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R 312039Z JAN 75

FM SECSTATE WASHDC

TO AMEMBASSY BELGRADE

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E. O. 11652: GDS

TAGS: EFIN

SUBJECT: DOUBLE TAXATION TREATY

REF: BELGRADE 252

1. PROFESSOR JONAS IS A TREASURY CONSULTANT COLLECTING MATERIAL ON TAXES IN SELECTED EASTERN EUROPEAN COUNTRIES BUT IS NOT TO BE REGARDED AS A TREASURY SPOKESMAN. MR. BRAOVICH AND OTHER OFFICIALS CONCERNED WITH PROSPECTIVE TREATY NEGOTIATIONS SHOULD UNDERSTAND THAT VIEWS EXPRESSED BY PROFESSOR JONAS ON TREATY MATTERS WERE PERSONAL AND DO NOT REPRESENT USG POLICY. IMPORTANT THAT GOY NOT BE MISLED INTO THINKING THAT A COMMITMENT HAS BEEN MADE TO PROVIDE A CREDIT BY TREATY IF THEY UNILATERALLY RESTRUCTURE THEIR INCENTIVES TO US INVESTORS. AS MR. GORDON, DEPUTY TO ASSISTANT SECRETARY OF TREASURY,
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PAGE 02 STATE 022980

MENTIONED IN PRELIMINARY DISCUSSIONS OCTOBER 1973, US

SENATE HAS BEEN OPPOSED TO EXTENDING THE FOREIGN TAX CREDIT TO TAXES NOT ACTUALLY PAID. INCENTIVE AND DIVIDEND QUESTIONS WILL NEED CAREFUL CONSIDERATION DURING THE TREATY NEGOTIATIONS.

2. REGRET OVERSIGHT IN NOT SENDING EMBASSY COPY OF DRAFT TREATY SENT TO GOY LAST AUGUST. DRAFT WAS TRANSMITTED THROUGH YUGOSLAV EMBASSY HERE IN RESPONSE TO THEIR REQUEST ON TRANSMITTING GOY DRAFT TO US, BUT WE HAD INTENDED TO SEND AN INFORMATION COPY TO EMBASSY SIMULTANEOUSLY. COPIES OF BOTH DRAFTS HAVE BEEN AIRPOUCHED.

3. AS OF NOW APRIL 1975 ACCEPTABLE FOR SCHEDULING OF NEGOTIATIONS. WOULD APPRECIATE RECEIVING FIRM GOY PROPOSAL ASAP SINCE THAT IS ALWAYS A BUSY PERIOD. KISSINGER

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Message Attributes

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